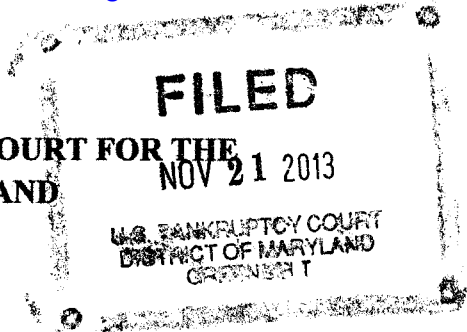


**UNITED STATES BANKRUPTCY COURT FOR THE  
DISTRICT OF MARYLAND  
AT GREENBELT**



**ANGELIA Y. HAWKES**  
**(fka. Angelia Y. Saunders)**  
**Plaintiff,**

**Case No: 13-18333**

**v.**

**Adversary No. 13-00453**

**JOSEPH E. SAUNDERS**  
**Defendant,**

**MOTION TO COMPEL DISCOVERY**

**COMES NOW**, Joseph Saunders (Defendant), and moves this Court, pursuant to Fed R. Bankr. P 7037-1 for an Order compelling the Plaintiff, Angelia Y. Hawkes, to respond to Defendant's discovery requests. The Plaintiff failed to answer interrogatories, production of documents, and request for Admissions are insufficient; and in support thereof states as follows:

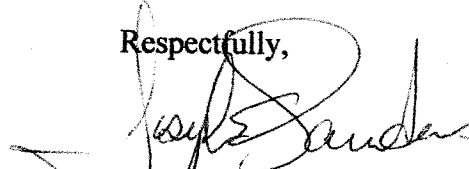
1. On or about October 18, 2013, the Plaintiff was served the Defendant's First Set of Interrogatories. (Exhibit 6)
2. On or about October 18, 2013, the Plaintiff was served the Defendant's First Request for Production of Documents. (Exhibit 7)
3. On or about October 18, 2013, the Plaintiff was served the Defendant's First Set of Request for Admissions. (Exhibit 8)
4. On November 9, 2013, the Defendant received from the Plaintiff as her responses to discovery crossed out and lined through copies of the Defendants First Set of

Production of Documents (Exhibit 9), Defendants First Set of Request for Interrogatories (Exhibit 10) and the Defendants First Set of Request for Admission (Exhibit 11); which were served on the Defendant on or about November 10, 2013.

5. The crossed out and lined through documents received from the Plaintiff were hand scribed and are not legible.
6. The Plaintiff failed to respond to the Defendants First Set of Production of Documents. The Plaintiff did not provide the Defendant with the documents requested.
7. The Plaintiff failed to respond to the Defendants First set of Interrogatories.
8. The request for Admissions numbers 3, 4, 5, 8, 10, the Plaintiff failed to identify which part is admitted to and/or which part is denied.
9. The request for Admissions numbers 7, 9, 11, 12, 13, 14; the Plaintiff failed to admit or deny in her response.
10. The Plaintiff has acted in bad faith and have embarked on an obstructive course of conduct designed to frustrate the Defendant's every attempt to discover information to which he is entitled as "relevant to the subject matter" of his claim.
11. A good faith letter was sent to the Plaintiff outlining the insufficient and lack of responses to discovery on November 10, 2013; along with the extension to respond to said discovery requests, due to the Defendant on November 18, 2013. (Exhibit 12)
12. To date, the Plaintiff has not responded to the good faith letter request for discovery responses.

**WHEREFORE**, the Defendant respectfully moves this Honorable Court for an Order to compel the Plaintiff to fully and completely respond to said discovery within 5 days, all objections are waived, and for all reasonable expenses incurred in obtaining this Order.

Respectfully,



JOSEPH E. SAUNDERS

45221 Woodstown Way  
California, MD 20619  
703.981.4647

Attached Exhibits:  
Nos.1 through 12

**CERTIFICATE OF SERVICE**

I certify that on this 19<sup>th</sup> day of November 2013, a true and accurate copy of this pleading, Motion to Compel Discovery was sent, via first-class postage prepaid mail to:

Angelia Hawkes  
13493 Wansteadt Place  
Bristow, VA 20136